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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EXPEREXCHANGE, INC. a California
Corporation, DBA: EXPERVISION,
Plaintiff,

vs.

DOCULEX, INC., a Florida corporation;
CARL STRANG, an individual; TERRY
MORGAN, an individual; DAVID BAILEY,
an individual; JIM GREBEY, an individual;
DAVID GRIFFITH, an individual,
Defendants.

Case No.: **CV-08-3875 JCS**

**JOINT STIPULATION AND ORDER
FOLLOWING IN-PERSON MEET &
CONFER ON DISCOVERY DISPUTE**

AND RELATED CROSS-ACTION

Plaintiff ExperExchange, Inc. and Defendants DOCULEX, INC., CARL STRANG,
TERRY MORGAN, DAVID BAILEY, JIM GREBEY, DAVID GRIFFITH hereby stipulate to
provide the following supplemental responses and/or production:

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JOINT STIPULATION AND ORDER FOLLOWING IN-PERSON MEET & CONFER ON
DISCOVERY DISPUTE

1 **Defendant Demands:**

2 **Document Requests 14 & 15, 30 (includes Interrogatory No. 19).**

3 Plaintiff agrees to produce attachments 4 & 5 for every RSLA entered into between 1999
4 and August of 2008. Plaintiff may redact customer identifying information.
5

6 **Document Request 19.**

7
8 Plaintiff agrees to supplement its response to RFP # 19 by producing the Bo Yan
9 Interview Summary.
10

11 **Document Request 31 - 37.**

12 Plaintiff agrees to supplement its response by providing all non-privileged documents
13 related to Plaintiff's RSLA disputes with the following companies:
14

15 REBUS, Inc.; PSIGEN, Inc., Atalasoft, Inc., Top Imaging Systems, Inc., HanWang, Inc.
16

17 **Interrogatories 4, 5, 7 – 12:**

18 Plaintiff agrees to supplement its responses within 10 days following Defendant's
19 supplemental production as set forth, *infra*.
20

21 **Interrogatory 18:**

22 Plaintiff agrees to provide supplemental responses by September 18, 2009.
23

24 **Plaintiff Demands:**

25 **Document Demands to Doculex 98**

26 Defendant agrees to supplement its response by producing internal communications
27 regarding the software engineering design and development of any software products from the
28 trade name list by September 18, 2009, to the extent any exist, and have not already been

1 produced.

2
3 **Document Demands to Doculex 96 and 108**

4 Defendants agree that if the Court denies Defendant's summary adjudication motion as to
5 Discovery Cracker, Defendants will supplement their production by providing Discovery
6 Cracker Division sales documents within 10 days after the Court ruling.
7

8 **Document Demands to Doculex (100, 101, 102, 103, 104, 105)**

9 Defendant agrees to supplement its production regarding customer downloads for RTK
10 software upgrades for products on the trade name list by September 18, 2009, if any documents
11 exist.
12

13
14 **Document Demands to Doculex (92)**

15 Defendant agrees to supplement its production by providing any earlier versions of the
16 program known as Discovery Cracker (prior to version 5.0) in its custody and control, by
17 September 18, 2009.
18

19 **Document Demands to Individual Defendants**

20 **Document Demands to David Bailey (10):**

21 Defendant agrees to supplement his production regarding marketing plans for products on
22 the trade name list by September 18, 2009, if any documents exist.
23

24
25 Richardson Intellectual Property Law, Prof. Corp.
26
27

28 /s/ Daniel R. Richardson

Daniel R. Richardson, Esq.
Attorneys for Plaintiff

1 Kinsella Weitzman Iser Kump & Aldisert, LLP

2
3 /s/ David W. Swift

4 David W. Swift, Esq.
5 Attorney for Defendants

6
7 IT IS SO ORDERED

8
9 Date: September 2, 2009

